

EXHIBIT “A”

WELT & KUZEMCZAK, LLC.
990 CLIFTON AVENUE
CLIFTON, NEW JERSEY
(973) 773-9800

Attorneys for Plaintiffs
Attorney ID: 033301980

GRAZYNA KWARTA

Plaintiff,

-VS-

COSTCO, and/or JOHN and JANE
DOES 1-5 (said names being fictitious),
ABC Companies 1-5 (said names being
fictitious)

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: PASSAIC COUNTY
DOCKET NO.

Civil Action

COMPLAINT AND JURY DEMAND

Plaintiff, **GRAZYNA KWARTA**, residing at 90 Marilyn Place, Clifton, New Jersey, complaining
of the defendants says:

FIRST COUNT

1. At all times mentioned herein, **COSTCO, and/or JOHN and JANE**
DOES 1-5 (said names being fictitious), were the owners, landlords, tenants, and/or otherwise in
custody and control of property located at 149 State Route 23, Wayne, New Jersey.

2. On or about July 25, 2020, the plaintiff, **GRAZYNA KWARTA**, was lawfully
walking on the said property owned, operated, designed, constructed, supervised, maintained
inspected and controlled by said defendants.

3. Defendants, **COSTCO, and/or JOHN and JANE DOES 1-5 (said names being**
fictitious), individually or through certain mutual arrangements and/or agreements with **ABC**
Companies 1-5 (said names being fictitious), as well as through the acts and/or omissions of
their agents, servants and/or employees were responsible for the maintenance, repair, inspection,

supervision and upkeep of the property.

4. On or about July 25, 2020, the plaintiff, **GRAZYNA KWARTA**, was caused to fall to the ground as a proximate result of the dangerous and hazardous condition then existing on said premises.

5. Said dangerous and hazardous conditions were caused, created and/or allowed to exist on the property as aforesaid due to the carelessness and negligence of the defendants, and each of them, and the defendants were further careless and negligent in failing to remedy, repair, notify appropriate city officials and/or warn the public of same.

6. As a result of the negligence and carelessness of the defendants as aforesaid, the plaintiff, **GRAZYNA KWARTA**, was cause to sustain and suffer severe personal injuries, both temporary and permanent in nature, permanent consequential limitations of use of body organs and members, and suffered significant limitations of use of body functions or systems, has in the past and will in the future be caused to suffer severe pain, anguish and emotional distress, as in the past and will in the future be incapacitated, limited and restricted in his normal activities and occupations, and has in the past and will in the future be caused to expend substantial sums of money for medical treatment in an effort to relieve her pain and cure her injuries, which are of a permanent nature and has lost wages.

WHEREFORE, plaintiff, **GRAZYNA KWARTA**, demands judgment against the defendants jointly, severally or in the alternative, for money damages together with interest and cost of suit.

JURY DEMAND

Plaintiff, **GRAZYNA KWARTA**, hereby demands trial by a jury of six on all of the issues.

WELT & KUZEMCZAK, LLC.
Attorneys for Plaintiff,

By: D. Welt
David M. Welt, ESQ.

DATED: July 5, 2022

CERTIFICATION PURSUANT TO R. 4:5-1

1. The matter in controversy is the subject of a pending action or arbitration proceeding as follows: **None.**
2. Contemplation of another action or arbitration proceeding is contemplated as follows: **None.**
3. The following parties listed should be joined in this action: **None.**

I hereby certify that the above statements made by me are true. I am aware that if any of the above statements made by me are wilfully false, I am subject to punishment.

WELT & KUZEMCZAK, LLC.
Attorneys for Plaintiff,

By: D. Welt
David M. Welt, ESQ.

Dated: July 5, 2022

EXHIBIT “B”

07/06/2022 10:38 FAX

WELT & KUZEMCZAK, LLC.
990 Clifton Ave., 2nd Floor
Clifton, New Jersey 07013
(973) 773-9800
David M. Welt, Esq.
Attorney ID.: 033301980
ATTORNEYS FOR PLAINTIFF

GRAZYNA KWARTA

Plaintiff,
Vs.

COSTCO, and/or JOHN and JANE
DOES 1-5, (said names being fictitious),
ABC Companies 1-5 (said names
being fictitious)

Defendants,

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION-PASSAIC COUNTY

DOCKET No.: PAS-L-001662-22
Civil Action

SUMMONS

From the State of New Jersey, to

COSTCO

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the Deputy Clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each Deputy Clerk of the Superior Court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Passaic County Courthouse, Law Division. A \$175.00 filing fee payable to the Treasurer State of New Jersey and a Completed Case Information Statement (available for the Deputy Clerk of the Superior Court) must accompany your answer or motion when it is filed.

You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or

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• served in person on
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motion (with fee and completed Case Information Statement) if you want the Court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Dated:

Michelle M. Smith
Clerk of the Superior Court

Name of defendant to be served:

Costco
149 State Route 23
Wayne, New Jersey 07470

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Attorneys for Plaintiffs
Attorney ID: 033301980

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LAW DIVISION: PASSAIC COUNTY
DOCKET NO. PAS-L-001662-22

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